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VIA ECF

February 20, 2023

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007
(212) 805-6350
CaproniNYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Petróleos de Venezuela S.A.*, No. 21-cv-02684-VEC

Dear Judge Caproni:

This firm represents defendant Petróleos de Venezuela, S.A. (“PDVSA”) in the above-referenced action. Pursuant to the Court’s Memo Endorsement dated February 13, 2023, Dkt. No. 105, we are writing to request an alternative timeline to address the communication from the Direção-Geral da Administração da Justiça (“DGAJ”). Currently, the Court has set a deadline for PDVSA to submit a translation of and response to the DGAJ’s communication or to propose an alternate schedule for such translation and response by February 21, 2023.

In light of the stayed nature of this case, we request a brief extension of PDVSA’s time to provide the Court with a translation of and response to the DGAJ’s communication. We propose a new deadline for PDVSA to submit the translation and response by or on March 7, 2023.

We are available at the Court’s convenience to answer any questions, and appreciate the Court’s attention to this matter.

Respectfully submitted,
/s/ Dennis H. Tracey, III
Dennis H. Tracey, III